

ATTACHMENT A: STIPULATED FACTS
UNITED STATES v. JULIUS JEROME ROBINSON

The parties hereby stipulate and agree that if this case proceeded to trial, the United States would have proven the following facts beyond a reasonable doubt. They agree that these are not all of the facts that would be proved if this case proceeded to trial.

On April 19, 2017, **JULIUS JEROME ROBINSON** (“**ROBINSON**”) engaged in a transaction of controlled substances with another individual at a Shell Gas Station located at the intersection of Powder Mill Road and Cherry Hill Road, in Beltsville, Maryland. Police officers of the Prince George’s County (Maryland) Police Department witnessed the transaction.

Officers approached **ROBINSON**, and **ROBINSON** fled on foot. Officers pursued **ROBINSON** and ultimately apprehended him and placed him under arrest. While being arrested, **ROBINSON** stated, in sum and substance, “Don’t freak out, but I have a gun.”

Officers searched **ROBINSON** and found a firearm in **ROBINSON**’s front-right jacket pocket. The firearm was loaded with two rounds of ammunition. Subsequent examination by law enforcement revealed that the handgun was a Taurus .38 Special with serial number AT63082, that the gun was fully functional, and that the ammunition in the gun was .38 Special Caliber cartridges. The weapon was manufactured in Brazil, and thus travelled in interstate and foreign commerce prior to its recovery by law enforcement in the District of Maryland. The ammunition was manufactured in North Carolina and thus travelled in interstate commerce prior to its recovery by law enforcement in the District of Maryland.

In addition to the firearm and ammunition, law enforcement seized from **ROBINSON**’s person 4.5 grams of marijuana, 7.3 grams of crack cocaine, and 7.3 grams of heroin.

Prior to April 19, 2017, **ROBINSON** had been convicted in the District of Columbia Superior Court of armed robbery, a crime punishable by more than one year of imprisonment, and his civil rights had not been restored.

* * *

I have read this statement of facts, and have carefully reviewed it with my attorney. I acknowledge that it is true and correct.

8-21-17
Date

Julius Jerome Robinson
Julius Jerome Robinson

I am the attorney for Julius Jerome Robinson. I have carefully reviewed the statement of facts with him.

8-21-17
Date

Michael CitaraManis, Esq.
Michael CitaraManis, Esq.